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PROPOSED COUNSEL FOR THE TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

IN RE:	§	
	§	CASE NO. 19-45206-ELM
SYNERGY FABRICATION, INC.	§	
	§	
	§	CHAPTER 7
	§	
DEBTOR	§	<b>Docket Call: N/A</b>

**AMENDED APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT  
OF GENERAL COUNSEL FOR THE CHAPTER 7 TRUSTEE**

TO THE HONORABLE Edward L. Morris, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Shawn K. Brown, Chapter 7 Trustee in the referenced case (“Trustee”), and files this Amended Application and in support thereof would respectfully show that:

1. Debtor filed a Petition seeking relief under Chapter 7 of the Bankruptcy Code on December 30, 2019. The Trustee was appointed as Chapter 7 trustee.
2. The Trustee has determined that he requires general counsel to properly administer the estate. The Trustee will be marketing assets for sale and will require assistance of general counsel in connection with the sale process. Further, the Trustee anticipates that legal services may be necessary in the claim allowance process. The Trustee requires legal assistance to address general case legal matters.

3. The Trustee wishes to employ The Law Office of Shawn K. Brown PLLC, PO Box 93749, Southlake TX 76092 (“Applicant” or the “Firm”) as his counsel in this case. The Trustee has selected Applicant due to the considerable experience of the Firm in handling matters of this character. Applicant’s attorneys are admitted to practice before this Court, and are well qualified to represent the Trustee in this case.

4. The professional services which Applicant will render include, but are not limited to, the following:

- a. Furnishing legal advice to the Trustee with regard to his powers, duties and responsibilities as a Chapter 7 Trustee;
- b. The preparation, for and on behalf of the Trustee, of all necessary applications, motions, answers, orders, reports and other legal papers;
- c. Investigating and prosecuting any preference and fraudulent transfer actions arising under the avoidance powers of the Bankruptcy Code, as necessary;
- d. To initiate, appear for, prosecute, defend and represent Trustee’s interest in suits arising in, arising under, or related to this case; and
- e. Performing all other legal services for the Trustee which may be necessary herein.

5. To the best of Trustee’s knowledge, except as may be stated in the affidavit attached hereto as an exhibit, the Firm does not have any connection with the Debtor, the creditors of the estate, or any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, except that the Trustee is a shareholder in the Firm

6. The Firm represents no interest adverse to either the Trustee or the estate in the matters to which it will be engaged for the Trustee, and the employment of said firm would serve the best interests of this estate.

7. The Trustee desires to employ the Firm on an hourly basis for actual and necessary services rendered by the Firm, based upon the time, the nature, the extent, and the value of said services, in accordance with the Firm's usual rates for the cost of comparable services other than in a case under Chapter 7, together with reimbursement of the Firm's actual and necessary expenses. The principal attorney, Shawn K. Brown, has a normal hourly billing rate of \$350 per hour. The hourly rates charged by the firm are subject to periodic adjustments to reflect changing economic conditions and the increasing experience and expertise of its attorneys and personnel in the area of bankruptcy law. Consistent with the rules and procedures of this District, counsel for the Trustee will file fee applications for approval of the payment for the fees and expenses incurred. It is anticipated that the fees and expenses will be paid from the funds in the estate, if any.

8. This amendment is made to correct the affidavit attached to the original application which was inadvertently unsigned by the Applicant.

WHEREFORE, PREMISES CONSIDERED, Shawn K. Brown, Chapter 7 Trustee, requests that this Honorable Court approve his employment of The Law Office of Shawn K. Brown PC, under the terms specified hereinabove, together with such other and further relief to which he may be justly entitled.

Respectfully submitted,

THE LAW OFFICE OF SHAWN K. BROWN  
PLLC

/s/ Shawn K. Brown  
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PROPOSED COUNSEL FOR THE TRUSTEE

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Application for Order Authorizing Employment of Counsel for the Trustee was served upon the Debtor's counsel, the United States Trustee, and upon the parties requesting notice, via the Court's CM/ECF system, on the date of filing.

/s/ Shawn K. Brown

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**AFFIDAVIT IN SUPPORT OF APPLICATION  
TO EMPLOY ATTORNEYS**

STATE OF TEXAS	§
	§
COUNTY OF TARRANT	§

BEFORE ME, the undersigned authority, on this day personally appeared Shawn K. Brown, who, being duly sworn, states upon his oath the following:

1. My name is Shawn K. Brown. I am more than twenty-one (21) years of age. I have never been convicted of a crime. I have personal knowledge of every statement made in this Affidavit and am fully competent to testify to the matters stated herein. I do hereby swear that all the facts contained herein are true and correct.

2. I am a shareholder in The Law Office of Shawn K. Brown PLLC ("Firm"). I am also the Trustee in this case. I have reviewed the case creditor list and other pertinent documents in the case. The Firm, to the best of my knowledge has not represented any of the creditors in this bankruptcy case. The Firm's associates and other members, to the best of my knowledge, do not have any connection with the Debtor, the creditors of the estate, or any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee.

3. The Firm does not hold or represent an interest adverse to the estate and is a disinterested person as required by 11 U.S.C. §327(a).

4. It is necessary for the Trustee to employ counsel in this proceeding under Chapter 7 of the Bankruptcy Code.

FURTHER AFFIANT SAYETH NOT.



Shawn K. Brown

SUBSCRIBED AND SWORN to before me on this 16<sup>th</sup> day of January, 2020, to which witness my hand and official seal of office.

SEAL



Notary Public, State of Texas

